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Proposed Attorneys for Chapter 11 Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SAN FERNANDO DIVISION**

In re:

IRONCLAD PERFORMANCE WEAR
CORPORATION, a California
corporation,

Debtor and Debtor in
Possession.

In re:

IRONCLAD PERFORMANCE WEAR
CORPORATION, a Nevada corporation,

Debtor and Debtor in
Possession.

- ☒ Affects both Debtors
- ☐ Affects Ironclad Performance Wear
Corporation, a California corporation only
- ☐ Affects Ironclad Performance Wear
Corporation, a Nevada corporation only

Lead Case No.: 1:17-bk-12408-MB

(Proposed to be) Jointly administered with:

1:17-bk-12409-MB
(Ironclad Performance Wear Corporation, a
Nevada corporation)

Chapter 11 Cases

**DECLARATION OF STEPHANIE
REICHERT REGARDING SERVICE OF
DEBTORS' EMERGENCY "FIRST DAY"
MOTIONS**

Emergency Hearing Schedule:

Date: September 13, 2017

Time: 2:00 p.m.

**Place: Courtroom 303
21041 Burbank Blvd.
Woodland Hills, CA 91367**

DECLARATION OF STEPHANIE REICHERT

I, Stephanie Reichert, hereby declare as follows:

1. I am over the age of 18 and not a party to these bankruptcy cases and am an employee of Levene, Neale, Bender, Yoo & Brill L.L.P. ("LNBYB"), proposed bankruptcy counsel to the above-listed Chapter 11 debtors and debtors in possession.

2. I have personal knowledge of the facts set forth herein, and, if called as a witness, could and would testify competently with respect thereto.

3. On September 11, 2017, the Debtors filed the following Emergency Motions and related pleadings:

(i) *Debtor's Ex Parte Motion For Entry Of An Order For Joint Administration Of Cases; Declaration Of L. Geoff Greulich In Support Thereof* [Docket No. 5]

(ii) *Omnibus Declaration Of L. Geoff Greulich In Support Of Debtors' Emergency "First Day" Motions* [Docket No. 6]

(iii) *Debtors' Emergency Motion For Entry Of An Interim Order: (I) Authorizing The Debtors To (A) Obtain Post-Petition Financing Pursuant To 11 U.S.C. §§ 105, 361, 362 And 364, And (B) Utilize Cash Collateral Pursuant To 11 U.S.C. §§ 361, 362, 363 And 364; (II) Granting Adequate Protection Pursuant To 11 U.S.C. §§ 361, 362, 363 And 364; (III) Scheduling A Final Hearing Pursuant To Bankruptcy Rules 4001(b) And 4001(c); And (IV) Granting Related* [Docket No. 7]

(iv) *Declaration Of Monica Y. Kim In Support Of Debtors' Emergency Cash Collateral And DIP Financing Motion* [Docket No. 8]

(v) *Statement Regarding Cash Collateral Or Debtor In Possession Financing* [Docket No. 9]

- 1
- 2 (vi) *Debtors' Motion For An Order: (1) Approving Form Of Asset Purchase*
- 3 *Agreement For Stalking Horse Bidder And For Prospective Overbidders*
- 4 *To Use, (2) Approving Auction Sale Format, Bidding Procedures, And*
- 5 *Stalking Horse Bid Protections; (3) Approving Form Of Notice To Be*
- 6 *Provided To Interested Parties; And (4) Scheduling A Court Hearing To*
- 7 *Consider Approval Of The Sale To The Highest Bidder [Docket No. 10]*
- 8
- 9 (vii) *Debtors' Emergency Motion For Authority To File Letter Agreement*
- 10 *Under Seal [Docket No. 11]*
- 11
- 12 (viii) *Debtors' Emergency Motion For Entry Of An Order Authorizing Debtors*
- 13 *To (1) Pay Pre-Petition Wages; And (2) Honor Accrued Vacation And*
- 14 *Leave Benefits [Docket No. 12]*
- 15
- 16 (ix) *Debtors' Emergency Motion For Entry Of An Order Authorizing Debtors*
- 17 *To Provide Adequate Assurance Of Future Payment To Utility Companies*
- 18 *Pursuant To Section 366(c) Of The Bankruptcy Code [Docket No. 13]*
- 19
- 20 (x) *Debtors' Emergency Motion For Entry Of An Order: (A) Authorizing The*
- 21 *Continued Use Of Certain Portion Of The Debtors' Cash Management*
- 22 *System, (B) Authorizing The Maintenance Of Payroll And Receivables*
- 23 *Bank Accounts; And (C) Authorizing Banks To Release Administrative*
- 24 *Holds And/Or Freezes On The Debtors' Pre-Petition Accounts [Docket No.*
- 25 *14]*
- 26
- 27 (xi) *Notice Of Hearings On Emergency "First Day" Motions Filed By Debtors*
- 28 *[Docket No. 15]*

4. On September 11, 2017, all of the above Emergency Motions and related pleadings were served via overnight mail upon secured creditors in both of the Debtors' cases, the twenty largest creditors in each of the Debtors' bankruptcy cases, and the Office of the United States Trustee. Attached hereto as Exhibit "A" is the service list showing the addresses to which the Emergency Motions and related pleadings were served via overnight delivery on September 11, 2017.

5. Additionally, on September 11, 2017 the Utilities Motion and Notice of Hearing on Debtors' Emergency "First Day" Motions were also served via overnight mail upon all utility companies affected by the Utilities Motion. Attached hereto as Exhibit "B" are the lists of utility providers in each of the above Chapter 11 cases upon whom the Debtors' Emergency Motion For Entry Of An Order Authorizing Debtors To Provide Adequate Assurance of Future Payment to Utility Companies Pursuant to Section 366(c) of the Bankruptcy Code and Notice of Hearing on the Emergency Motions were served via overnight delivery on September 11, 2017.

6. Attached hereto as Exhibit "C" is a list of the available telephone numbers which were used to contact said creditors and utility providers to inform them either personally, through their assistants, or via voicemail of the September 13, 2017 at 2:00 p.m. hearing on the Emergency Motions. Exhibit "C" also lists the available email addresses which were used to contact said creditors to provide them with pdf copies of the Emergency Motions and related pleadings.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. Executed this 12th day of September, 2017, at Los Angeles, California.

/s/ Stephanie Reichert
STEPHANIE REICHERT

EXHIBIT “A”

Ironclad Performance Wear (8300)
OUST, Secured & Top 20

United States Trustee
915 Wilshire Blvd., Suite 1850
Los Angeles, California 90017

U. S. Securities and Exchange
Commission
Attn: Bankruptcy Counsel
444 South Flower Street, Suite 900
Los Angeles, CA 90071-9591

Secured Creditor

Radians Wareham Holding, Inc.
Attn: Mike Tutor, CEO
5305 Distriplex Farms
Memphis, TN 38141

Counsel to Radians Wareham Holdings

E. Franklin Childress, Jr.
Baker, Donelson, Bearman, Caldwell &
Berkowitz, PC
165 Madison Ave, Suite 2000
Memphis, Tennessee 38103

Counsel to Radians Wareham Holdings

Sharon Z. Weiss
Bryan Cave
120 Broadway, Suite 300
Santa Monica, CA 90401

Top 20 Unsecured Creditors:

Advantage Media Services, Inc.
Attn: Steven Helmle
29010 Commerce Center Drive
Valencia, CA 91355

Danny Negara
Mercindo Global Manufaktur
Jl. Raya Semarang-Bawen Km.29
SEemerang, Central Java
50661, Indonesia

Eliza Yang
Nantong Changbang Gloves Co.
Flat/RM 1602 Chit Lee Comm
Bldg 30-36, Shau Kei Wan Road
Hong Kong, China

Gerard
BDO USA, LLP
P. O. BOX 677973
Dallas, TX 75267-7973

Kwong
PT JJ GLOVES INDO
JL Ronggowarsito, Mlese, Ceper
Bonded Zone, Klaten
Central Java, Indonesia, 57463

Mark Robba
PT SPORT GLOVE INDONESIA
Krandon Desa Pandowoharjo
Sleman
Yogyakarta, Indonesia, 55512

Daniel Gomes
Capital One Bank
P. O. BOX 1917
Merrifield, VA 22116-1917

Brent Waters
Resources Global Professionals
P.O. Box 740909
Los Angeles, CA 90074-0909

Skadden Arps Slate Meagher & Flom
LLP
P O Box 1764
White Plains, NY 10602

Carol Pearson
FedEx
PO Box 7221
Pasadena, CA 91109-7321

Risk Consulting Partners
24722 Network Place
Chicago, IL 60673-1247

Robert Tejeda
Stubbs, Alderton & Markiles, LLP
15260 Ventura Blvd
20th Floor
Sherman Oaks, CA 91403

Ms. Vicz Yue
Ka Hung Glove Industrial Co. Ltd.
Fujian Quanzhou Jiacheng Leather
Chi Feng Road, Quanzhou City
Fujian, 362000, China

Shur-Sales & Marketing, Inc.
3830 S Windermere St.
Englewood, CO 80110

John Calhoun
Synetra
1110 E. State Highway 114
Suite 200
Southlake, TX 76092

Sky Lin
Marusan - Mimasu Tshusho Co. Ltd.
No 1 Queen' Road Central
Hong Kong
China

Carla Durand
University of Milwaukee
P O Box 500
University of Wisconsin - Milwaukee
Milwaukee, WI 53201

Bradley J. S. Weiss
Winspeed Sports Shanghai Co., Ltd.
858 Mingzhu Road
Shanghai
China, 00020-1702

Janice Lee
Woneel Midas Leathers
JI Gembor Raya Desa Pasirjaya
Tangerang
Banten, Indonesia, 15135

Liliana Dominguez
Yellow and Roadway
P. O. Box 100129
Pasadena, CA 91355

1920 Hutton Court
Attn: Johnny Clark
Inwood National Bank
P O Box 857413
Richardson, TX 75085

EXHIBIT “B”

Ironclad Performance Wear (8300)
Utility Companies

Republic Services # 794
P.O. Box 78829
Phoenix, AZ
85062-8829

TXU Energy
P.O. BOX 650638
Dallas, TX 75265-0638

Tyco Integrated Security, LLC
P.O. Box 371967
Pittsburgh, PA 15250-7967

Windstream
PAETEC
P.O. Box 9001013
Louisville, KY 40290-1013

Atmos
P.O. Box 790311
St. Louis, MO 63179-0311

EXHIBIT “C”

Ironclad Performance Wear (8300)
OUST, Secured & Top 20

United States Trustee
Attn: S. Margaux Ross
Phone: 213-894-4494
Email: margaux.ross@usdoj.gov

Counsel to Radians Wareham Holdings
Baker, Donelson, Bearman, Caldwell &
Berkowitz, PC
Attn: E. Franklin Childress, Jr.
Phone: (901) 577-2147
Email: fchildress@bakerdonelson.com

Counsel to Radians Wareham Holdings
Bryan Cave
Attn: Sharon Z. Weiss
Phone: (310) 576-2276
Email: sharon.weiss@bryancave.com

Top 20 Unsecured Creditors:

Advantage Media Services, Inc.
Attn: Steven Helmle
Phone: (661) 775-7600
Email: jessica.galindo@amsfulfillment.com

Mercindo Global Manufaktur
Attn: Danny Negara
Phone: 858-939-0033
Email: danny@asiglovelmail.com

Nantong Changbang Gloves Co.
Attn: Eliza Yang
Phone: 86-513-81961600
Email: yang@cb-glove.com

BDO USA, LLP
Attn: Gerard
Phone: (214) 969-7007

PT JJ GLOVES INDO
Attn: Kwong
Phone: 6 2 272 335 9499
Email: kwong@jjglove.com

PT SPORT GLOVE INDONESIA
Attn: Mark Robba
Phone: 781-934-6100
Email: mrobba@aol.com

Capital One Bank
Attn: Daniel Gomes
Phone: (855) 675-1212
Email: Daniel.Gomes@capitalone.com

Resources Global Professionals
Attn: Brent Waters
Phone: (714) 430-6400
Email: Brent.Waters@rgp.com

Skadden Arps Slate Meagher & Flom
LLP
Phone: (212) 735-3000

FedEx
Attn: Carol Pearson
Phone: (214) 563-7068
Email: cppearson@fedex.com

Risk Consulting Partners
Phone: (314) 678-1200

Stubbs, Alderton & Markiles, LLP
Attn: Robert Tejeda
Phone: (818) 444-4500
Email: rtejada@stubbsalderton.com

Ka Hung Glove Industrial Co. Ltd.
Fujian Quanzhou Jiacheng Leather
Attn: Ms. Vicz Yue
Phone: 85-595-2810-6611
Email: JIACHEN9188@163.COM

Shur-Sales & Marketing, Inc.
Phone: (303) 789-5596

Synetra
Attn: John Calhoun
Phone: (432) 561-7200
Email: jcalhoun@synetra.com

Marusan - Mimasu Tshusho Co. Ltd.
Attn: Sky Lin
Phone: 86-21-59213021
WEmail: skylin@marusan-glove.com

University of Milwaukee
Attn: Carla Durand
Phone: (14) 229-6012
Email: durandc@uwm.edu

Winspeed Sports Shanghai Co., Ltd.
Attn: Bradley J. S. Weiss
Phone: 86-021-59883338 ext. 804
Email: bweiss@winspeedsports.com

Woneel Midas Leathers
Attn: Janice Lee
Phone: (626) 799-0600
Email: woneelamerica@gmail.com

Yellow and Roadway
Attn: Liliana Dominguez
Phone: (214) 412-8557
Email:
Liliana.DominguezPinon@YRCFreight.com

1920 Hutton Court
Attn: Johnny Clark
Phone: (972) 280-8313
Email: jclark@hldallas.com

Utility Companies:

Republic Services # 794
Phone: (480) 627-2700

TXU Energy
Phone: (800) 725-7920

Tyco Integrated Security, LLC
Phone: (561) 988-7200

Windstream / PAETEC
Phone: (800) 537-7755

Atmos
Phone: (888) 286-6700

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 10250 Constellation Boulevard, Suite 1700, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled **DECLARATION OF STEPHANIE REICHERT REGARDING SERVICE OF DEBTORS' EMERGENCY "FIRST DAY" MOTIONS** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **September 12, 2017**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Ron Bender rb@lnbyb.com
- Monica Y Kim myk@lnbrb.com, myk@ecf.inforuptcy.com
- Krikor J Meshefejian kjm@lnbrb.com
- S Margaux Ross margaux.ross@usdoj.gov
- United States Trustee (SV) ustpreion16.wh.ecf@usdoj.gov
- Sharon Z. Weiss sharon.weiss@bryancave.com, raul.morales@bryancave.com

2. SERVED BY UNITED STATES MAIL: On **September 12, 2017**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **September 12, 2017**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Served via Attorney Service

Hon. Martin R. Barash
United States Bankruptcy Court
21041 Burbank Boulevard, Suite 342
Woodland Hills, CA 91367

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

September 12, 2017

Date

Stephanie Reichert

Type Name

/s/ Stephanie Reichert

Signature